

UST FACILITY COMPLIANCE INSPECTION HANDBOOK

INTRODUCTION

This handbook was written for inspectors and managers of California's local underground storage tank (UST) programs. Since 1985, local government agencies with UST programs have been known as "LIAs," or "local implementing agencies."

Under a law effective January 1, 1994, local government agencies consolidated programs dealing with hazardous substances into a single program managed by a single local agency - the Certified Unified Program Agency (CUPA). The Unified Program consolidates six different programs: the hazardous waste generator and onsite treatment programs, underground storage tank program, business plan program, risk management and prevention program, and portions of the above ground tank and Uniform Fire Code programs. The UST forms A, B, and C have been modified (see Appendix A) and incorporated into the "Unified Program Consolidated Form."

The Unified Program represents a major change in the management of hazardous waste and hazardous materials in California. For example, business owners within a CUPA jurisdiction will no longer pay multiple fees relating to hazardous waste and hazardous materials. These fees have been consolidated into a single fee system, and billed and collected by the CUPA. Inspections are also consolidated into a single inspection program managed by the CUPA. "Local implementing agencies are now referred to as "local agencies".

As the program exists today, California's USTs are subject to state law and regulations and the requirements of over 100 local agencies that issue operating permits to tank owners for approximately 55,000 USTs. At the county level, the local agency is usually within a Department of Health or Environmental Health. In a city, the local agency is usually within a Fire Department (see Appendix J for a list of local agency contacts).

One of the responsibilities of the State Water Resources Control Board (SWRCB) is to assist local agencies to implement and enforce the UST program. The SWRCB does this by adopting regulations covering construction, installation, monitoring, repairing, and removing UST systems. The SWRCB also publishes documents such as local guidance letters and other pamphlets and brochures when needed.

In an effort to better communicate with local agencies, the SWRCB began making scheduled visits in 1992 to find out how the local programs were working, to provide training on effective facility inspections, and to learn first-hand the problems faced by local regulators. These visits are now conducted in conjunction with the CUPA evaluation team.

Our agency visits have been interesting in many respects. In some agencies, the UST program is well staffed, inspectors have support and encouragement from management, the UST fees adequately support the program, and enforcement is even-handed and consistent.

We have also visited agencies where UST programs struggle under inadequate staffing and deficient funding. In these agencies, UST programs are given little attention, not because staff is unconcerned about the environment, but because other, revenue-generating projects and programs take precedence. If your agency falls into the last category we encourage you to look for ideas from other agencies where UST programs are up, running, and effective - where revenue is not a problem because the fee structures cover the costs of administering the programs. Get in touch with other local agencies for ideas, copies of forms, database set-up information, inspection procedures, inspection checklists, etc. You don't have to reinvent the wheel to have a great UST program!



This booklet was written for inspectors and managers of California's local underground storage tank (UST) programs. Other industry people such as tank owners, tank testers, consultants, contractors, manufacturers of leak detection monitoring equipment, and other government agency representatives may find the information useful.

To receive copies of this booklet at no charge, please fax your request to the State Water Resources Control Board, Underground Storage Tank Program at (916) 227-4349 or email [Marjorie Jobe](#).

SCOPE OF THIS DOCUMENT

This handbook covers facility compliance inspections and inspection follow-up activities. Guidance regarding tank installation and removal inspections is not included.

Use of the terms, "he," "him," and "his" are not intended to be gender specific, but are used to maintain an easy flow of text.